

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

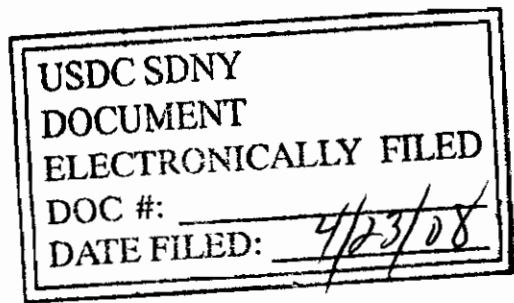
OLIVIER MARTINEZ and SHEEBA, INC.,

Plaintiffs,

- against -

VAKKO HOLDING A.S., VAKKO TEKSTIL  
VE HAZIR GIYIM SANAYI ISLETMELERI A.S.,  
CEM HAKKO, STARWORKS, LLC, TURK  
HAVA YOLLARI A.O., TURKISH AIRLINES,  
INC. and JOHN DOES, 1-10,

Defendants.



07 CV 3413 (LAP)

**PROPOSED**  
**SCHEDULING ORDER**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, plaintiffs Olivier Martinez and Sheeba, Inc. ("Plaintiffs") and defendants Vakko Holding A.S., Vakko Tekstil Ve Hazir Giyim Sanayi Isletmeleri A.S., Cem Hakko (collectively, "Vakko") and Starworks, LLC ("Starworks") (together, "Defendants") hereby jointly submit the following proposed scheduling order.

1. **DISCOVERY SCHEDULE**

Starworks has filed a motion to dismiss, which this Court has not yet decided. Discovery involving Starworks will not commence until fifteen days after this Court decides Starworks's motion to dismiss, if this Court denies Starworks's motion. Accordingly, paragraphs 1a, 1b, and 1c below shall not apply to Starworks.

The parties will commence discovery as follows:

- a. **Initial Disclosures.** Initial disclosures shall be exchanged on or before May 9, 2008.
- b. **Document Requests.** The parties shall serve their first request for documents, if any, on or before May 16, 2008. Responses and objections to the document demands

shall be served on June 6, 2008. All documents responsive to the parties' first requests for documents are to be produced no later than June 27, 2008.

c. Interrogatories. The parties shall serve their first set of Interrogatories, if any, consistent with SDNY Local Rule 33.3, on or before May 16, 2008. Responses and objections to the Interrogatories, if any, shall be served on or before June 13, 2008.

e. Starworks. Starworks shall serve its initial disclosures, first requests for document, and interrogatories (consistent with paragraph 1c, above), if any, upon all other parties no later than fifteen (15) days following this Court's denial of its motion. All other parties will serve their first requests for documents and interrogatories (consistent with paragraph 1c, above), if any, upon Starworks within fifteen (15) days following this Court's denial of its motion. All responses to the discovery requests served on or by Starworks shall be served no later than thirty (30) days after the date of service of such requests.

f. Depositions. Depositions of all fact witnesses shall be taken during a four month period to commence on June 27, 2008.

g. Fact discovery shall be concluded on October 27, 2008.

h. *Counsel shall appear for a conference on October 30, 2008 at 9:30 a.m.*

i. Expert Discovery. Experts, other than rebuttal experts, shall be designated on or before November 3, 2008. Expert reports (other than for rebuttal experts), if any, shall be produced no later November 26, 2008, and expert depositions (other than for rebuttal experts) shall be completed no later than December 26, 2008. Rebuttal expert reports, if any, shall be served no later than January 26, 2009. Rebuttal expert depositions, if any, shall take place no later than February 25, 2009.

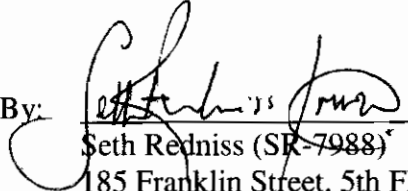
j. Requests to admit. Requests to admit, if any, are to be served no later than October 27, 2008.

2. DISPOSITIVE MOTIONS

At the close of discovery, the parties will promptly consult in an attempt to determine whether it is appropriate to file motions for summary judgment, to resolve the case through some form of alternate dispute resolution, or to proceed to trial. The parties will submit a joint proposal to the Court outlining their positions no later than two weeks following the end date for all disclosure. Nothing herein shall prevent the parties from making partial or full dispositive motions prior to this time, although the parties shall consult before making any such motion.

Dated: New York, New York  
April 18, 2008

REDNISS & ASSOCIATES LLP

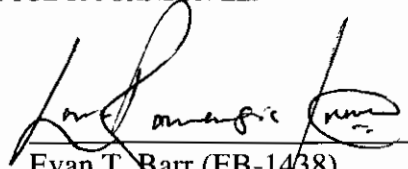
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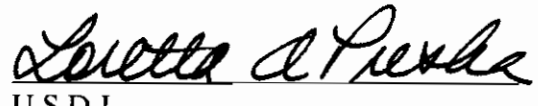
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*and Starworks, LLC*

SO ORDERED:

  
U.S.D.J.  
*April 22, 2008*